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[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE AQUA METALS, INC. SECURITIES )  
LITIGATION ) Case No.: 4:17-cv-07142-HSG  
)  
) **CLASS ACTION**  
)  
) **JOINT STIPULATION OF PROPOSED**  
) **SCHEDULE**

This document Relates to: )  
All Actions. )  
)  
)  
)

Judge: Hon. Haywood S. Gilliam, Jr.

Lead Plaintiff the Plymouth County Group (consisting of Plymouth County Retirement Association, Denis Taillefer and his private company, 1103371 Ontario Ltd.), together with Defendants Aqua Metals, Inc. (“Aqua Metals”), Thomas Murphy, Selwyn Mould and Stephen R. Clarke (collectively, “Defendants”), respectfully submit this Joint Stipulation of Proposed Case Schedule pursuant to the Court’s October 5, 2021 Order Granting Preliminary Approval of Settlement (ECF No. 170).

### **I. PROPOSED SCHEDULE**

The Parties make the below proposal and reserve the right to seek to modify the following deadlines.

<b>Event</b>	<b>Date</b>
Deadline for mailing Notice and Claim Form	October 20, 2021
Filing deadline for final approval motion	November 19, 2021
Filing deadline for attorneys’ fees and costs motion	November 19, 2021
Filing deadline for motion for reimbursement of cost and expenses for Lead Plaintiff	November 19, 2021
Deadline for Class Members to opt out or object to settlement and/or application for attorneys’ fees and costs and reimbursement of cost and expenses for Lead Plaintiff, at least 45 days after the filing of the motions for attorneys’ fees and incentive payments	January 3, 2022
Final fairness hearing and hearing on motions	February 2, 2022

DATED: October 7, 2021

Respectfully submitted,

**LEVI & KORSINSKY, LLP**

By: /s/ Shannon L. Hopkins

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DATED: October 7, 2021

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**E-FILING ATTESTATION**

I, Shannon L. Hopkins, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Michael R. Hogue and Steven M. Schatz have concurred in this filing.

*/s/ Shannon L. Hopkins*

Shannon L. Hopkins

**[PROPOSED] CASE SCHEDULE**

The above JOINT STIPULATION OF PROPOSED SCHEDULE AND PROPOSED ORDER is approved for this case and all parties shall comply with its provisions. [In addition, the Court makes the further orders stated below:]

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE